

Office of the Superintendent

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Tracey J. Quarne, Superintendent

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Modernizing the E-rate) WC Docket No. 13-184
Program for Schools and Libraries)

**COMMENTS BY GLENN COUNTY OFFICE OF EDUCATION
RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING (NPRM)**

To whom it may concern,

I am writing the FCC to voice my support of the changes to the E-rate program that I have outlined below. Glenn County Office of Education is located in rural Glenn County, Northern California. I have 4 Schools in multiple sites throughout the county, and serve approximately 375 students of our own. Through WAN links, we provide internet access to 6 out of the 8 school districts in our county. These links provide internet services to online educational resources to approximately 3,500 students and 150 teachers. Through the years, E-rate support has been critical to my school district's ability to bring technology access to our school. However, with the transition to digital instructional tools, new online applications and computer adaptive testing, we have not had adequate access to funding to support our students and teachers access to these resources.

E-rate has been a tremendous help and is critical for our schools and libraries as they transition towards 21st Century learning environments. As it currently stands, the E-rate program is severely underfunded and has numerous complex rules and steps resulting in a significant share of districts that decide to contract with consultants in order to safely navigate through the program. We encourage the FCC to improve the E-rate program in the ways suggested below. E-rate continues to be essential for the schools and simply needs to be modernized to keep up with the modern times.

Simplify the application process by: (NPRM ¶ 179-185)

1. Collect free/reduced lunch of total student population data at the district level (not campus or building level);
2. Make LOA's and Form 479 submission for consortia a one-time occurrence unless a school district or library drops from, or joins, a consortium or changes its CIPA compliance policies;
3. Train and designate consortium reviewers to expedite the PIA Review process so that a funding commitment is issued not later than six months after the application window closes;
4. Require PIA review of long-term contracts only once and then validate every year thereafter via invoices for the duration of the contract.

Promote support for scalable, flexible and affordable fiber infrastructure solutions where it is feasible to meet current and future needs of schools and libraries as well as support the use of Microwave and other Wireless LAN solutions. (NPRM ¶ 67-70)

1. Terrestrial buried fiber followed by overhead fiber is preferred, whether dark or lit fiber;
2. Microwave and wireless is acceptable.

Include Internet2 or R&E network access, particularly Commercial Peering Service, as eligible e-rate costs to improve service quality of connections. (NPRM ¶ 18; 28; 190; USC 254 (b)(1))

1. Commercial Peering Service is a faster, less expensive Internet source than commodity Internet, but is currently not an eligible service because it cannot be competitively bid.

Encourage the FCC to promote private-public broadband partnerships and incentivize private and non-profit broadband solutions for e-rate funded school and library connectivity. (NPRM ¶ 164; 75)

Increase the current E-Rate funding cap to allow for schools and libraries to achieve the goals laid out in the ConnectED initiative. (NPRM ¶ 58-60; 67-70)

1. Raising the cap should be considered only as part of an initiative to push through the barriers that remain to affordable and scalable high speed networks.
2. Identify capital projects for funding that exhibit the greatest likelihood of reducing long-term demand/costs for Federal USF.
3. Address demand pressure by refocusing eligible services on broadband "connections" to students, educators, and patrons.

FCC should modernize the eligible services list to prioritize bandwidth capacity and classroom connections over all other services [i.e., digital transmission service, fiber and dark fiber service, fixed wireless access and internet access]. (NPRM ¶ 248-249)

1. Application services should no longer be funded. This would include web hosting, email, broadcast messaging service, or any service that could be hosted in a "cloud", with the possible exception of VoIP services since there are many advanced interactive capabilities integrated into this form of "voice" service.
2. De-prioritize non-IP based services including cellular.
3. Allow Priority 1 funding for network access components, required inside wiring, and wireless access points (formerly Priority 2).

Research and Education, state, and regional networks use E-rate support to provide many varied services that assist schools and libraries. (NPRM ¶ 186; 190; 28)

1. To achieve enhanced network efficiency by employing such strategies as dynamic routing protocols, state backbones, traffic shaping, caching servers, commercial peering services, private cloud storage, etc... - that improve the reliability and quality of connectivity to schools and libraries and lessen their dependence on commodity Internet.
2. To achieve greater cost efficiencies through aggregated purchasing of Internet access, statewide master contracts for WAN circuits, dark fiber and lit fiber backbone build-out projects, and enterprise agreements for network management and monitoring software.
3. To form a community of formal and informal education providers such as schools, libraries, science centers, museums, aquaria, and cultural centers that work together to develop and deliver rich educational content and programming to schools and libraries over the networks.

Encourage FCC to restructure USAC data collection and reporting on connectivity type, bandwidth amount, cost, and vendor information to measure availability and affordability. (NPRM ¶ 52-54)

1. Reconstruct the Form 471-Item 21 Attachment to collect the individual circuit, Internet bandwidth, and student population data needed to determine under-provisioned and under-served areas, as well as high cost service areas.

In closing, I sincerely appreciate the opportunity to make comments on a program that is vital to help our deserving young student's educational growth and prosperity as we move forward in the 21st Century. Without this program, we would fail to give our students in Glenn County the equitable access to technology and online resources that is accessible to their peers in urban areas across the country.

Sincerely,



Tracey Quarne
Superintendent

Glenn County Office of Education